

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

CYNTHIA ADVANI MARSHALL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:20-cv-00442
	)	
	)	
JOHN MARSHALL, <i>et al.</i> ,	)	
	)	
	)	
Defendants.	)	

**DEFENDANT BRENDA MARSHALL THOMPSON’S**  
**MOTION TO DISMISS**

Defendant, Brenda Marshall Thompson (“Thompson”), by counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(6), moves to dismiss Plaintiff’s Complaint for failure to state a claim upon which relief can be granted. Plaintiff’s claims against Thompson fail as a matter of law, and pursuant to the Supreme Court’s decisions in Ashcroft v. Iqbal, 556 U.S. 662 (2009) and Bell Atl. Corp. v. Twombly, 550 U.S. 544 (2007), Plaintiff’s factual allegations are insufficient to state a claim for relief that is plausible on its face.

The reasons and authority for this motion are more fully set forth in the accompanying Memorandum in Support, filed contemporaneously herewith.

WHEREFORE, Defendant, Brenda Marshall Thompson, by counsel, respectfully requests that the Court grant her Motion to Dismiss, dismiss the Complaint against her with prejudice, and award such other and further relief as the Court deems proper.

BRENDA MARSHALL THOMPSON

By: /s/ William D. Bayliss

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*Counsel for Brenda Marshall Thompson*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 24, 2020, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties.

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